| 1 2 | BILL LOCKYER, Attorney General of the State of California BARRY D. LADENDORF, State Bar No. 52548 | |
|--------|---|----------------------------------|
| 3 | Attorneys for Complainant | |
| 4 | California Department of Justice 110 West "A" Street, Suite 1100 San Diego, CA 92101 | |
| 5 | P.O. Box 85266 | |
| 6 7 | San Diego, CA 92186-5266 Telephone: (619) 645-2063 Facsimile: (619) 645-2061 | |
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| 9 | PHYSICAL THERAPY BOARD OF CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA | |
| 10 | | |
| 11 | In the Matter of the Accusation Against: | Case No. ID 2003-63416 |
| 12 | LYNNE JONES EDDY | STIPULATION FOR REVOCATION |
| 13 | 4391 Huggins Street San Diego, CA 92122 | OF LICENSE AND ORDER |
| 14 | | |
| 15 | Physical Therapist License No. 14164 | |
| 16 | Respondent. | |
| 17 | | |
| 18 | IT IS HEREBY STIPULATED AND AGREED by and between the parties in this | |
| 19 | proceeding that the following matters are true: | |
| 20 | <u>PARTIES</u> | |
| 21 | 1. Steven K. Hartzell (Complainant) is the Executive Officer of the Physical | |
| 22 | Therapy Board of California. He brought this action solely in his official capacity and is | |
| 23 | represented in this matter by Bill Lockyer, Attorney General of the State of California, by Barry | |
| 24 | D. Ladendorf, Supervising Deputy Attorney General | |
| 25 | 2. LYNNE JONES EDDY (Respondent) is representing herself in this | |
| 26 | proceeding and has chosen not to exercise her right to be represented by counsel. | |
| 27 | 3. On or about March 18, 1987, the Physical Therapy Board of California | |
| 28 | issued Physical Therapist License No. 14164 to LYN | NNE JONES EDDY (Respondent). The |
| | | |

License was in full force and effect at all times relevant to the charges brought in Accusation No. ID 2003-63416 and will expire on July 31, 2004, unless renewed.

JURISDICTION

4. Accusation No. ID 2003-63416 was filed before the Physical Therapy Board of Califomia (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on May 26, 2004. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. ID 2003-63416 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

- 5. Respondent has carefully read, and understands the charges and allegations in Accusation No. ID 2003-63416. Respondent also has carefully read, and understands the effects of this Stipulation for Revocation of License.
- 6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.
- 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. ID 2003-63416, agrees that cause exists for discipline and hereby gives up her right to contest that cause for discipline exists based on those charges and agrees to be bound by the Board's disciplinary order as set forth below.

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9. Respondent understands that by signing this stipulation she enables the 1 2 Board to issue its order revoking her license without further process. 3 **CONTINGENCY** 4 10. This stipulation shall be subject to approval by the Physical Therapy Board 5 of California. Respondent understands and agrees that counsel for Complainant and the staff of 6 the Physical Therapy Board of California may communicate directly with the Board regarding 7 this stipulation for revocation of license, without notice to or participation by Respondent. By 8 signing the stipulation, Respondent understands and agrees that she may not withdraw her 9 agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon 10 it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulation and 11 Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be 12 inadmissible in any legal action between the parties, and the Board shall not be disqualified from 13 further action by having considered this matter. The parties understand and agree that facsimile copies of this Stipulation 14 11. 15 for Revocation of License, including facsimile signatures thereto, shall have the same force and 16 effect as the originals. 17 12. In consideration of the foregoing admissions and stipulations, the parties 18 agree that the Board may, without further notice or opportunity to be heard, issue and enter the 19 following Order: 20 **ORDER** 21 IT IS HEREBY ORDERED that Physical Therapist License No. 14164, 22 heretofore issued to Respondent LYNNE JONES EDDY, is revoked by the Physical Therapy 23 Board of California. 24 13. Respondent shall lose all rights and privileges as a Physical Therapist in 25 California as of the effective date of the Board's Decision and Order. 26 14. Respondent shall cause to be delivered to the Board both her License

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wall and pocket license certificate on or before the effective date of the Decision and Order.

| 1 | ENDODGEMENT | |
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| 1 | <u>ENDORSEMENT</u> | |
| 2 | The foregoing Stipulation for Revocation of License and Order is hereby | |
| 3 | respectfully submitted for consideration by the Physical Therapy Board of California of the | |
| 4 | Department of Consumer Affairs. | |
| 5 | | |
| 6 | DATED: <u>June 16, 2004</u> . | |
| 7 | | |
| 8 | BILL LOCKYER, Attorney General of the State of California | |
| 9 | of the State of Camorina | |
| 10 | Original Signed By: | |
| 11 | Original Signed By: BARRY D. LADENDORF, Supervising Deputy Attorney General | |
| 12 | Attorneys for Complainant | |
| 13 | Thomey's for complainant | |
| 14 | Eddy, Lynne Stipulated Revocation.wpd | |
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Exhibit A Accusation No. ID 2003-63416

BEFORE THE PHYSICAL THERAPY BOARD OF CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

| In the Matter of the Accusation Against: | Case No. ID 2003-63416 | |
|--|------------------------|--|
| LYNNE JONES EDDY 4391 Huggins Street San Diego, CA 92122 | | |
| Physical Therapist License No. 14164, | | |
| Respondent. | | |
| | | |
| <u>DECISION AND ORDER</u> | | |
| The attached Stipulation for Revocation of License and Order is hereby adopted | | |
| by the Physical Therapy Board of California, Department of Consumer Affairs, as its Decision | | |
| | | |

This Decision shall become effective on August 16, 2004.

It is so ORDERED July 15, 2004.

and Order in this matter.

Original Signed By: Donald A. Chu, PhD, PT, President FOR THE PHYSICAL THERAPY BOARD OF CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS